

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Br. No. 23-10152
DMD SERVICES, INC. :
Debtor. : Chapter 11

**MOTION FOR ORDER FOR APPROVAL OF DISCLOSURE STATEMENT AND
FOR AUTHORITY TO FIX THE DATES FOR THE
FILING OF ACCEPTANCES, REJECTIONS OR OBJECTIONS
TO THE PLAN**

Debtor herein, DMD Services, Inc. , by its attorney, Timothy Zearfoss, Esquire, hereby requests that this Honorable Court enter an order for approval of the disclosure statement related to the plan of reorganization filed in the above-captioned bankruptcy case and for authority to fix the dates for filing of acceptances, rejections or objections to the plan and in support thereof represents:

1. On January 18, 2023 debtor filed its petition for reorganization under Chapter 11 of the United States Bankruptcy Code.

2. Since that time debtor has operated as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code ("the code").

3. In conjunction with the filing of this motion, debtor filed its Disclosure Statement and proposed Plan of Reorganization on July 25, 2023.

4. Pursuant to this motion, debtor is requesting approval of its Disclosure Statement, and the setting of

deadlines for approval or rejection of the proposed Plan of Reorganization.

5. Under Section 1125(b) of the Code, prior to soliciting votes under the plan, debtor must obtain approval of the Disclosure Statement and must serve all creditors and parties in interest with the proposed plan and approved Disclosure Statement.

6. Debtor believes the Disclosure Statement contains adequate information as required under Section 1125(a) of the Code and therefore approval is warranted.

WHEREFORE, debtor respectfully requests that this Honorable Court approve the Disclosure Statement with similar approval of plan voting procedures, together with the fixing of the deadline for acceptance or rejection of the Plan, the date for the hearing on confirmation of the Plan, and for other such relief as is just and equitable.

/s/Timothy Zearfoss
Timothy Zearfoss, Esquire
Attorney for Debtor